

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

KIMBERLY HUDSON-BRYANT,
individually and on behalf of all others
similarly situated,

Case No. 4:25-cv-1245

Plaintiff,

v.

SCHNEIDER WALLACE COTTRELL
KONECKY WOTKYNS LLP

Defendant.

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Kimberley Hudson-Bryant, and defendant Schneider Wallace Cottrell Konecky, LLP, jointly move the Court, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and this Court's policies and procedures, to enter the Protective Order attached hereto as **Exhibit A**. In support of their motion, the parties state as follows.

1. Discovery in this matter is likely to involve the disclosure and exchange of confidential information, including trade secrets (including internet advertising practices and other business practices), and non-public customer information, pricing information, financial information, and other valuable research, development, commercial, financial, technical and/or proprietary information which warrants special protection.

2. Good cause exists for the Court to enter a protective order in this case because: (1) release of such information would violate the producing party's legitimate private interests in its trade secrets and other proprietary information, causing serious competitive injury, (2) allowing the foregoing confidential and proprietary information to become public would have no benefit to public health and safety or any other public interest, (3) protection of the parties' trade secrets and

other propriety information will serve the public interest by fostering the protection of intellectual property and confidential business information, (4) the parties are not public entities or officials and this case does not involve issues important to the public, and (5) having a protective order in place will expedite discovery in a fair and efficient manner, help avoid disputes over confidentiality of discovery materials, permit reasonable uses of such material for preparation and conduct of trial, and address the handling of protected information at the end of the litigation, and otherwise serve the ends of justice.

3. For these reasons, entry of a protective order satisfies the requirements of Rule 26(c).

WHEREFORE, the parties respectfully request that the Court grant their motion and enter the Protective Order attached hereto as **Exhibit A**.

Dated: May 13, 2025

Respectfully Submitted,

/s/ Andrew Roman Perrong, Esq.

Andrew Roman Perrong, Esquire
Perrong Law LLC
2657 Mount Carmel Ave.
Glenside, PA 19038
a@perronglaw.com

/s/ Paul A. Roman Jr., Esq.

Larry Bowman, Esquire
Grotefeld Hoffmann LLP
1717 Main Street, Suite 3650
Dallas, TX 75201
LBowman@ghlaw-llp
Tel: (214) 507-4581

/s/ Anthony Paronich, Esq.

Anthony Paronich, Esquire
Paronich Law, P.C.
350 Lincoln St., Ste 2400
Hingham, MA 02043
anthony@paronichlaw.com

Attorneys for Plaintiff
Kimberley Hudson-Bryant

Steven W. Zoffer, Esquire (*pro hac vice*)

Paul A. Roman, Jr., Esquire (*pro hac vice*)
Dickie McCamey & Chilcote, P.C.
Four Gateway Center
444 Liberty Avenue, Suite 1000
Pittsburgh, PA 15222
szoffer@dmclaw.com
proman@dmclaw.com
Tel: (412) 281-7272

Attorneys for Defendant,
Schneider Wallace Cottrell Konecky LLP

CERTIFICATE OF SERVICE

I, Paul A. Roman, Jr., Esquire, hereby certify that true and correct copies of the foregoing **JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER** have been served this 13th day of May, 2025, via the Court's CM/ECF system on all counsel of record listed below:

Andrew Roman Perrong, Esquire
Perrong Law LLC
2657 Mount Carmel Ave.
Glenside, PA 19038
a@perronglaw.com

Anthony Paronich, Esquire
Paronich Law, P.C.
350 Lincoln St., Ste 2400
Hingham, MA 02043
anthony@paronichlaw.com

*Attorneys for Plaintiff
Kimberley Hudson-Bryant*

By /s/ Paul A. Roman, Jr..
Paul A. Roman, Jr., Esquire

*Attorney for Defendant, Schneider Wallace
Cottrell Konecky, LLP, incorrectly identified
as Schneider Wallace Cottrell Konecky
Watkins LLP*